

KOG:2019R00473

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CLERK'S OFFICE
UNITED STATES OF AMERICA AT BALTIMORE

v.

BY _____ DEPUTY CRIMINAL NO. ROB-19-0337
* (Threat Against Federal Official, 18
* U.S.C. § 115(a)(1)(B); Threatening
* Interstate Communication, 18 U.S.C. §
* 875(c))
*

DARRYL ALBERT VARNUM,

Defendant

SUPERSEDING INDICTMENT

COUNT ONE

(Threat Against Federal Official)

The Grand Jury for the District of Maryland charges that:

On or about June 26, 2019, in the District of Maryland and elsewhere, the defendant

DARRYL ALBERT VARNUM

did threaten to murder Person #1, a member of the United States House of Representatives, with intent to impede, intimidate, and interfere with Person #1 while Person #1 was engaged in the performance of Person #1's official duties and with intent to retaliate against Person #1 on account of the performance of Person #1's official duties, in violation of Title 18, United States Code, Section 115.

18 U.S. C. § 115(a)(1)(B)

COUNT TWO

(Threat in Interstate Communication)

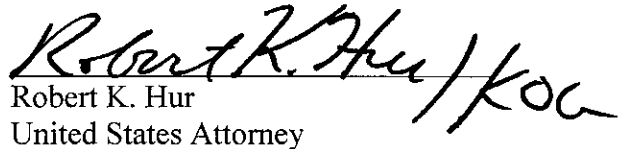
And the Grand Jury for the District of Maryland further charges:

On or about June 26, 2019, in the District of Maryland and elsewhere, the defendant,


DARRYL ALBERT VARNUM

knowingly and willfully did transmit and cause to be transmitted in interstate and foreign commerce from the State of Maryland to the State of Florida, a communication that contained a threat to injure the person of another, to wit: a communication made by cellular telephone in which the defendant threatened to murder a member of the United States House of Representatives.

18 U.S.C. § 875(c)


Robert K. Hur
United States Attorney

A TRUE BILL:


Date
SIGNATURE REDACTED
Foreperson